

**STUTZMAN, BROMERG, ESSERMAN, & PLIFKA,
A PROFESSIONAL CORPORATION**

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*Counsel for the Plaintiffs' Steering Committee
in In Re: Takata Airbag Product Liability
Litigation MDL*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

OLD CARCO LLC, *et al.*,

Debtors.

Chapter 11

Case No. 09-50002 (MG)

(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, hereby enters its appearance on behalf of the Plaintiffs, Chair Lead Counsel, Lead Counsel, and Plaintiffs' Steering Committee in *In re Takata Airbag Product Liability Litigation*, on behalf of the named plaintiffs in two putative class actions pending in the Takata MDL and subject to eventual class certification on behalf of others similarly situated (collectively, "**Plaintiffs**"), a party-in-interest in the above-referenced case, pursuant to 11 U.S.C. § 1109(b), Federal Rules of Bankruptcy Procedure 2002, 9007 and 9010, and respectfully requests that all notices that are given or required

to be given in this case, and all papers served or required to be served in this case, be given to and served upon the undersigned, at the address listed below:

Sander L. Esserman
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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure but also includes, without limitation, notice of any orders, applications, complaints, demands, hearings, motions, petitions, settlements, pleadings or requests, whether formal or informal, written or oral, or whether transmitted or conveyed by mail, delivery, telephone, or otherwise.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service of Papers shall not be deemed or construed as Plaintiffs': (a) waiver of the right to have final orders in non-core matters entered only after *de novo* review by a United States District Court; (b) waiver of a right to trial by jury in any proceeding so eligible in this case or in any case, controversy or proceeding related to this case; (c) waiver of the right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (d) waiver of the right to contest jurisdiction or appropriate venue to this proceeding or any related proceeding; or (e) waiver of any other rights or claims, actions, defenses, setoffs or recoupments which Plaintiffs have or may hereafter obtain, in law or in equity, all of which rights, claims,

actions, defenses, setoffs and recoupments Plaintiffs expressly reserve. This Notice of Appearance and Request for Service of Papers is not, and shall not be construed to be, a consent by Plaintiffs pursuant to 28 U.S.C. § 157(c)(2).

Respectfully submitted this 19th day of November, 2021.

**STUTZMAN, BROMBERG,
ESSERMAN & PLIFKA
A PROFESSIONAL CORPORATION**

By: /s/ Peter C. D'Apice

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Counsel for the Plaintiffs' Steering
Committee in In Re: Takata Airbag Product
Liability Litigation MDL

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon all parties of record via ECF electronic notice on November 19, 2021.

/s/ Peter C. D'Apice
Peter C. D'Apice